

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA
GOEDINGHAUS,

Plaintiffs,

V.

TRAMMELL S. CROW, JR., DR. BENJAMIN
TODD ELLER, RICHARD HUBBARD, DR.
MELISSA MILLER, DR. JOSEPH BOLIN,
DR. SCOTT WOODS, DR.
MRUGESHKUMAR SHAH, MICHAEL
CAIN, COE JURACEK, PHILIP ECOB, H.J.
COLE, TEXAS RANGER CODY MITCHELL,
KURT KNEWITZ, PAUL PENDERGRASS,
RALPH ROGERS, ROBERT PRUIT, SCOTT
BRUNSON, CASE GROVER, RICHARD
BUTLER, MARC MOLINA, MICHAEL
HYNES, JR., SHAWN MAYER, JADE
MAYER, RCI HOSPITALITY HOLDINGS,
INC., INTEGRITY BASED MARKETING,
LLC, STPORM FITNESS NUTRITION, LLC,
ULTRA COMBAT NUTRITION, LLC,
ECOLIFT HOMES LLC, ELEVATED
WELLNESS PARTNERS LLC, DOE
INDIVIDUALS 1–20, and DOE COMPANIES
21–30

Defendants.

[illegible]

Case No. 5:23-cv-00580-FB

Judge: Hon. Fred Biery

Courtroom: 8509

Date Action Filed: May 8, 2023 (transferred)

UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS

Defendant Trammell S. Crow, Jr. (“Crow”) requests leave to exceed the Court’s page limits and permit Crow to file a reply to the response to the motion to dismiss that is up to thirteen (13) pages long.

Pursuant to Local Rule CV-7(E), parties are limited to ten (10) pages for non-discovery motions. Plaintiffs' Response to Crow's Motion to Dismiss is 26 pages long and addresses multiple

causes of action pursuant to the Victims of Trafficking and Violence Protection Act of 2000 (“TVPA”) and RICO, under 18 U.S.C. § 1962(c) and (d), both of which are complex statutes with detailed pleading requirements and elements. Plaintiffs’ TVPA and RICO allegations are deficient for multiple, independent reasons. This request for three (3) additional pages is not for the purpose of delay or to complicate the proceedings but in order to ensure that the issues in dispute are clearly presented to the Court. A draft of the proposed Reply is attached as an Exhibit.

Crow has met and conferred with counsel for Plaintiffs and they are unopposed to the relief requested.

DATED: June 23, 2023

Respectfully submitted,

/s/ Kenneth C. Stone

Gerald E. Hawxhurst
Texas State Bar No. 24090636
jerry@hawxhurstllp.com
HAWXHURST LLP
1301 S. Capital of Texas Hwy
Building C, Suite 300
Austin, Texas 78746
Tel: (512) 522-4995
Fax: (512) 522-4961

GRAY REED
KENNETH C. STONE
Texas Bar No. 19296300
LONDON ENGLAND
Texas Bar No. 24110313
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332
Email: kstone@grayreed.com
lengland@grayreed.com

*Attorneys for Defendant Trammell S. Crow,
Jr.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was served on all counsel of record via ECF on June 23, 2023:

/s/ Kenneth C. Stone

Kenneth C. Stone

Attorneys for Defendant Trammell S. Crow, Jr.

CERTIFICATE OF CONFERENCE

The undersigned conferred with Matthew W. Schmidt, counsel for Plaintiffs, via email on June 22, 2023, and Mr. Schmidt stated Plaintiffs are unopposed to the relief requested.

/s/ Kenneth C. Stone

Kenneth C. Stone